

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JASON GOODMAN,	:
	:
Plaintiff,	: No. 21 Civ. 10878-AT-JLC
	:
-against-	: <i>Pro Se</i> Case
	:
	:
CHRISTOPHER BOUZY, et al.,	:
	:
Defendants.	:
	:
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DECLARATION OF SETH D. BERLIN

I, Seth D. Berlin, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am Senior Counsel with the law firm of Ballard Spahr LLP, which serves as counsel for Defendants Christopher Bouzy and Bot Sentinel Inc., as well as my colleague Maxwell Mishkin and myself (together, “Movants”) in the above-captioned matter. I was first admitted to practice in 1991 and was subsequently admitted to the Bar of this Court, where I have been a member in good standing since 2003. The facts stated below are true and within my own personal knowledge, and, if called to testify, I could and would competently testify thereto.

2. I submit this declaration in support of Movants’ motion to dismiss the Amended Complaint and, in particular, to place before the Court records that are referenced in the memorandum of law in support of that motion.

3. Each of the attached documents is referenced in and integral to Plaintiff’s Amended Complaint at pages 20-21, and each was attached to my prior declaration in support of Bouzy and Bot Sentinel’s motion to dismiss Plaintiff’s Initial Complaint. In addition, Plaintiff had attached less legible versions of Exhibits 1 and 2 to his Initial Complaint.

4. Attached hereto as Exhibit 1 is a true and correct copy of a message that Mr. Bouzy posted on Twitter on December 20, 2020, which includes a screenshot of a Direct Message that Plaintiff Jason Goodman sent to Mr. Bouzy on Twitter and which can also be found online at <https://twitter.com/cbouzy/status/1340646434446688258/photo/3>.

5. Attached hereto as Exhibit 2 is a true and correct copy of messages that Mr. Bouzy published on Twitter on December 19, 2020, and December 20, 2020, and which can be found online at <https://twitter.com/cbouzy/status/1340646434446688258/photo/1>.

6. Attached as Exhibit 3 is a court reporter's certified transcript of the first ten minutes of the telephone call that Mr. Goodman made to Mr. Bouzy on or about December 19, 2020, the complete audio recording of which Mr. Goodman published online and can be found at <https://odysee.com/@Crowdsourcethetruth:d/BOUZYBOTSENTINEL:a>.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 27, 2023 in Washington, D.C.

/s/ Seth D. Berlin
Seth D. Berlin

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of January 2023, I caused true and correct copies of the foregoing Declaration of Seth D. Berlin and the Exhibits thereto to be served by email and U.S. Mail First Class on the following:

Mr. Jason Goodman
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Defendant

/s/ Seth D. Berlin
Seth D. Berlin (SB7978)